

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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| IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION | MDL No. 2875 |
| THIS DOCUMENT RELATES TO: <i>Roberts v. Zhejiang Huahai Pharmaceutical Co. Ltd.,</i> Case No. 1:20-cv-00946-RMB-SAK | HON. RENÉE MARIE BUMB |

**CERTIFICATION OF C. BRETT VAUGHN IN SUPPORT OF
PLAINTIFFS' DAUBERT MOTION TO EXCLUDE DEFENSE EXPERT
VICTORIA CHERNYAK, M.D., M.S.**

C. BRETT VAUGHN, hereby certifies as follows:

1. I am an attorney at law within the State of Kansas with Nigh Goldenberg Raso & Vaughn, PLLC, and serve on the Plaintiffs' Executive Committee. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' motion to exclude the testimony of Victoria Chernyak, M.D., M.S. Highlights have been added to the following exhibits to correspond to citations in the motion to exclude.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the Expert Report of Victoria Chernyak, M.D., M.S.

3. Attached hereto as **Exhibit B** is a true and accurate copy the May 5, 2025, Deposition of Victoria Chernyak, M.D., M.S.

4. Attached hereto as **Exhibit C** is a true and accurate copy of the cited excerpts from the May 2, 2025, Deposition of Nadim Mahmud, M.D.

5. Attached hereto as **Exhibit D** is a true and accurate copy of the cited excerpts from the April 29, 2025, Deposition of Fareeha Siddiqui, M.D.

**NIGH GOLDBERG RASO
VAUGHN, PLLC**
Attorneys for Plaintiffs

Dated: May 22, 2025

By: /s/ C. Brett Vaughn

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CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ C. Brett Vaughn

C. Brett Vaughn, RN, BSN, JD